

**UNITED STATES BANKRUPTCY COURT
IN THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:
**ALAISEA MATAVAO
102 DALEWOOD DR
CLARKSVILLE, TN 37042
SOCIAL: XXX-XX-0864**

No. 3:17-bk-03957-CHARLES M. WALKER -13

Debtor

THE DEADLINE FOR FILING A RESPONSE IS 5/9/2018. THE HEARING WILL BE HELD ON 5/23/2018 AT 8:30 A.M. IN COURTROOM 1, 2nd FLOOR OF THE Custom House, 701 Broadway, Room 100, Nashville, TN 37203

**OBJECTION TO MOTION TO DISALLOW CLAIM OF MTGLQ INVESTORS, L.P. (PAYEE
Shellpoint Mortgage Servicing) COURT'S CLAIM #6**

Comes Now, Shellpoint Mortgage Servicing, by and through its attorney, Mackie Wolf Zientz & Mann, P.C., hereafter referred to as "Creditor" and for an Objection to the Trustee's Motion to Disallow Claim of MTGLQ INVESTORS, L.P. (payee Shellpoint Mortgage Servicing_) Court's Claim # 6 .

1. Creditor filed a proof of claim, court's claim # 6, on October 23rd, 2017, with documents attached in support of its claim.
2. On March 28th, 2018, Creditor filed an amended proof of claim, court's claim # 6.
3. On April 9th, 2018, the Trustee filed its Motion to Disallow claim based on the argument that "[t]he claimant has not provided a full loan history. The claimant's loan history on Form 410A does not begin with the first date of default. The loan history contains numerous unclear entries."
4. Creditor avows that its proof of claim is correct and that its pre-petition arrearage claim of \$12,439.03 should be paid in full.
5. In the event that the Court finds that the proof of claim is incorrect, Creditor requests that it be allowed to amend its proof of claim to provide updated information as determined by the Court.

PREMISE CONSIDERED, Creditor would pray that the Trustee's Motion be denied and May 8, requests a hearing on the same.

Respectfully Submitted,

/s/ Winston Davis

Winston Davis

Bar No. 35104

Attorney for Movant

MACKIE WOLF ZIENTZ & MANN, P.C.

5217 Maryland Way, Suite 404

Brentwood, TN 37027

(615) 238-3630

(615) 777-4517

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CERTIFICATE OF SERVICE

I, Winston Davis, on May 8, 2018, served the following by U.S. Mail or ECF, postage prepaid, with the foregoing Motion for Relief:

Via Pre-Paid U.S. Mail:

INITIA MATAVAO AND ALAISEA MATAVAO

102 DALEWOOD DR

CLARKSVILLE, TN 37042102 DALEWOOD DR

CLARKSVILLE, TN 37042-0000

Debtor(s)

Via ECF:

ROBERT HAMM MOYER

408 Franklin St.

Clarksville, TN 37040

Attorney for Debtor(s)

Via ECF:

Hildebrand, III, Henry E.

P.O. Box 340019

Nashville, TN 37203

Chapter 13 Trustee

/s/ Winston Davis

Winston Davis